

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

MDL No. 16-2738 (FLW) (LHG)

This Document Applies to All Actions Filed
Against Defendant Personal Care Products
Council

**DECLARATION OF THOMAS T. LOCKE IN SUPPORT OF PERSONAL CARE
PRODUCTS COUNCIL'S REPLY TO PLAINTIFFS' OPPOSITION TO PERSONAL
CARE PRODUCT COUNCIL'S MOTION FOR SUMMARY JUDGMENT**

I, Thomas T. Locke, do hereby declare under penalty of perjury that the following is true
and correct to the best of my personal knowledge:

1. I am an attorney with Seyfarth Shaw LLP, counsel for Defendant Personal Care Products Council ("PCPC") in the above-captioned matter.
2. I am over 18 years of age and have personal knowledge of the matters set forth herein.
3. I submit this declaration to place certain documents before the Court and in support of PCPC's Reply to Plaintiffs' Opposition to PCPC's Motion for Summary Judgment.
4. A true and correct copy of select pages from the deposition transcript of Dr. Linda Loretz on October 1, 2018, is attached hereto as **Exhibit A**.
5. A true and correct copy of select pages from the deposition transcript of Mark Pollak on August 29, 2018, is attached hereto as **Exhibit B**.
6. A true and correct copy of select pages from the deposition transcript of Dr. Loretz on July 17, 2018, is attached hereto as **Exhibit C**.

7. A true and correct copy of the National Toxicology Program Board of Scientific Counselors Meeting; Review of Nominations for Listing in the 10th RoC, 65 FR 61352 (Oct. 17, 2000) is attached here to as **Exhibit D**.

8. A true and correct copy of the National Toxicology Program; Call for Public Comments on 9 Substances Proposed for Listing in or Delisting from the Report on Carcinogens and Call for Public Comments on Substances, Mixtures and Exposure Circumstances Proposed for Listing in the Report on Carcinogens, Tenth Edition, 65 FR 17889–17893 (Apr. 5, 2000) is attached hereto as **Exhibit E**.

9. A true and correct copy of the Opposition to PCPC's Motion for Summary Judgment filed by the plaintiffs in *Denise Celia Simpson, et al. v. Johnson & Johnson, et al.*, case no. 2016 CA 001931 B, in the Superior Court of the District of Columbia is attached hereto as **Exhibit F**.

10. A true and correct copy of the Council on the District of Columbia Committee on Public Safety and the Judiciary, Report on Bill 18–893, Anti–SLAPP Act of 2010 (Nov. 18, 2010) is attached here to as **Exhibit G**.

11. A true and correct copy of the Preface from the First Edition of the CTFA Cosmetic Ingredient Dictionary 1973 (now referred to as PCPC's International Cosmetic Ingredient Dictionary & Handbook) is attached hereto as **Exhibit H**.

12. A true and correct copy of select pages from the deposition transcript of Dr. Loretz on October 2, 2018, is attached hereto as **Exhibit I**.

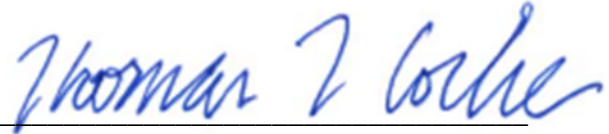
13. A true and correct copy of select pages from the *Daubert* hearing transcript of Dr. Daniel L. Clarke-Pearson (July 30, 2019) is attached hereto as **Exhibit J**.

14. A true and correct copy of select pages from the *Daubert* hearing transcript of Dr. Anne McTiernan (September 22, 2019) is attached hereto as **Exhibit K**.

EXECUTED this 22nd day of June, 2020

Washington, D.C.

By: _____



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